

1 Chad R. Fears (Nevada Bar No.: 6970)
2 **EVANS FEARS & SCHUTTERT LLP**
3 2300 W. Sahara Avenue, #950
4 Las Vegas, Nevada 89102
5 Telephone: (702) 805-0290
6 Facsimile: (702) 805-0291
7 Email: cfears@efstriallaw.com

8 Jonathan K. Waldrop (*pro hac vice*)
9 Darcy L. Jones (*pro hac vice*)
10 Marcus A. Barber (*pro hac vice*)
11 Jack Shaw (*pro hac vice*)
12 Heather S. Kim (*pro hac vice*)
13 **KASOWITZ BENSON TORRES LLP**
14 333 Twin Dolphin Drive, Suite 200
15 Redwood Shores, California 94065
16 Telephone: (650) 453-5170
17 Facsimile: (650) 453-5171
18 Email: jwaldrop@kasowitz.com
19 Email: djones@kasowitz.com
20 Email: mbarber@kasowitz.com
21 Email: jshaw@kasowitz.com
22 Email: hkim@kasowitz.com

23 *Attorneys for Defendant*
24 *Zmodo Technology Corporation Limited*

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 EYETALK365, LLC,

28 Plaintiff,

Case No. 3:17-cv-00686-RCJ-PAL

19 v.

20 *and related case*

21 ZMODO TECHNOLOGY
22 CORPORATION LIMITED,

23 Defendant.

24 EYETALK365, LLC,

25 Plaintiff,

26 Case No. 2:17-cv-02714-RCJ-PAL

27 v.

28 **JOINT STIPULATION TO STAY ALL
DEADLINES PENDING RESOLUTION**

29 ZMODO TECHNOLOGY
30 CORPORATION LIMITED,

31 Defendant.

JOINT STIPULATION TO STAY ALL
DEADLINES PENDING RESOLUTION

1 Plaintiff Zmodo Technology Corporation Limited (“Zmodo” or “Plaintiff”) and Defendant
2 Eyetalk365, LLC (“Eyetalk” or “Defendant”) hereby file this Joint Stipulation to Stay All Deadlines
3 Pending Resolution (the “Joint Stipulation”).

4 Plaintiff and Defendant hereby notify the Court that all matters in controversy between them
5 have been settled, in principle. Plaintiff and Defendant request that the Court stay the remaining
6 deadlines contained in the Court’s orders (Dkt. No. 233 in 2:17-cv-02714-RCJ-PAL; Dkt. No. 142
7 in Case No. 3:17-cv-00686-RCJ-PA) for thirty (30) days so that the parties can finalize the
8 resolution and file appropriate dismissal papers.

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 Plaintiff and Defendant will also file a status report to apprise the Court of the resolution
2 progress within twenty-one (21) days of the filing of the Joint Stipulation.

3 Dated: February 21, 2019

4 By: /s/ Jonathan K. Waldrop
5 Jonathan K. Waldrop (*pro hac vice*)
6 Darcy L. Jones (*pro hac vice*)
7 Marcus A. Barber (*pro hac vice*)
8 Jack Shaw (*pro hac vice*)
9 Heather S. Kim (*pro hac vice*)
10 **KASOWITZ BENSON TORRES LLP**
11 333 Twin Dolphin Drive, Suite 200
12 Redwood Shores, California 94065
13 Telephone: (650) 453-5170
14 Facsimile: (650) 453-5171
15 Email: jwaldrop@kasowitz.com
16 Email: djones@kasowitz.com
17 Email: mbarber@kasowitz.com
18 Email: jshaw@kasowitz.com
19 Email: hkim@kasowitz.com
20
21
22
23
24
25
26
27
28

Chad R. Fears (Nevada Bar No.: 6970)
EVANS FEARS & SCHUTTERT LLP
2300 W. Sahara Avenue, #950
Las Vegas, Nevada 89102
Telephone: (702) 805-0290
Facsimile: (702) 805-0291
Email: cfears@efstriallaw.com

Attorneys for Defendant
Zmodo Technology Corporation Limited

Dated: February 21, 2019

By: /s/ Gary R. Sorden
Gary R. Sorden (*pro hac vice*)
Tim Craddock (*pro hac vice*)
KLEMCHUK LLP
Campbell Centre II
8150 North Central Expressway,
10th Floor
Dallas, TX 75206
Telephone: (214) 367-6000
Facsimile: (214) 367-6001
Email: gary.sorden@klemchuk.com
Email: tim.craddock@klemchuk.com

Michael D. Rounds
(Nevada Bar No. 4734)
BROWNSTEIN HYATT FARBER
5371 Kietzke Lane
Reno, Nevada 89511
Telephone: (775) 324-4100
Facsimile: (775) 333-8171
Email: mrounds@bhfs.com

Attorneys for Plaintiff
Eyetalk365, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE/
UNITED STATES MAGISTRATE JUDGE
DATED: February 25, 2019

Case No. 3:17-cv-00686-RCJ-PAL
Case No. 2:17-cv-02714-RCJ-PAL